

AO 91 (Rev. 11/11) Criminal Complaint

## UNITED STATES DISTRICT COURT

for the

Southern District of Texas

United States of America  
v.  
Marcelino TORRES-Herrera

Case No.

\_\_\_\_\_  
*Defendant(s)*

## CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of January 22, 2025 in the county of Webb in the  
Southern District of Texas, the defendant(s) violated:

*Code Section*

8 USC 1326

*Offense Description*

A citizen of Mexico, who has previously been REMOVED or has departed the United States while an order of REMOVAL is outstanding was thereafter found in the United States in or near Laredo, Texas the said Defendant having not obtained the consent of the Attorney General of the United States (prior to March 1, 2003) or of the Secretary of the Department of Homeland Security (March 1, 2003 and thereafter- Title 6, United States Code, Sections 202 and 557) for the reapplication by the said Defendant for admission into the United States.

This criminal complaint is based on these facts:

On or about January 22, 2025 the defendant Marcelino TORRES-Herrera was apprehended near Laredo, Texas. After a brief interview it was determined that, Marcelino TORRES-Herrera was an undocumented alien from Mexico and subsequently placed under arrest. Further investigation revealed that Marcelino TORRES-Herrera was previously REMOVED from the United States on 01/22/2025 at Laredo, Tx. There is no record that Marcelino TORRES-Herrera has applied for or received permission from the Attorney General or the Secretary of Homeland Security to re-enter the United States after deportation.

☐ Continued on the attached sheet.

/S/Francisco Rivas-III

*Complainant's signature*

Francisco Rivas-III, Border Patrol Agent

*Printed name and title*

Sworn to before me and signed in my presence,

Date: January 24, 2025*Judge's signature*City and state: Laredo, Texas

Diana Song Quiroga, U.S. Magistrate Judge

*Printed name and title*